

FILED
HARRISBURG, PA

FEB 19 2020

PER 
DEPUTY CLERK

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA

NO. 1:20-CR-041

v.

(JUDGE WILSON)

DANIEL LEE BOOSE,

(ELECTRONICALLY FILED)

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(Receipt of child pornography)

Between in or about January 9, 2016, and continuing through in or about August 2019, in Adams County, within the Middle District of Pennsylvania, the defendant,

DANIEL LEE BOOSE,

did knowingly receive and attempt to receive child pornography, using any means and facility of interstate and foreign commerce, and that had been mailed, shipped, and transported in and affecting interstate commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

THE GRAND JURY FURTHER CHARGES:

COUNT TWO

(Possession of child pornography)

On or about August 15, 2019, in Adams County, within the Middle District of Pennsylvania, the defendant,

DANIEL LEE BOOSE,

knowingly possessed and caused to be possessed, images of child pornography, depicting a minor or minors engaged in sexually explicit conduct, including prepubescent minors under 12 years of age, that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce by any means, including by computer, and produced using materials that had been mailed, shipped and transported in interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B) and (b)(2).

NOTICE OF FORFEITURE

The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 2253.

The Grand Jury further finds probable cause that:

Upon conviction of any offense in violation of Title 18, United States Code, Section 2251, 2251A, or 2252, the defendant, **DANIEL LEE BOOSE**, shall forfeit to the United States:

- a. any visual depiction described in 18 U.S.C. §§ 2251, 2251A, or 2252, 2252A, 2252B or 2260, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Chapter 110, pursuant to 18 U.S.C. § 2253(a)(1);
- b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense(s), pursuant to 18 U.S.C. § 2253(a)(2); and
- c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense(s), or any property traceable to such property, pursuant to 18 U.S.C. § 2253(a)(3).

The property to be forfeited to the United States includes, but is not limited to, all computer(s) and/or electronic equipment used or

intended to be used to commit or to promote the commission of such offense(s). If any of the above-described forfeitable property, as a result of any act or omission of the defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

the United States shall be entitled to forfeiture of any other property of the defendant(s) up to the value of the above-described forfeitable property, as substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 2253(b) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON

02-19-2020
DATE

DAVID J. FREED
UNITED STATES ATTORNEY
Christian T. Haugsby
CHRISTIAN T. HAUGSBY
ASSISTANT U.S. ATTORNEY